## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

JANE DOE,	§		
Plaintiff,	\$ \$ 8		
v.	\$ \$ 8	Case No. 3:25-cv-00249	
JOHN ROE, XYZ, LLC;	\$ <b>§</b> 8		
Defendants.	§ §		

## DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Under Federal Rule of Civil Procedure 56(a), the Defendants move this Court for summary judgment as to Count I of the Plaintiff's Complaint (Plaintiff's 15 U.S.C. § 6851 claims). In support of this Motion, the Defendants have filed an accompanying Statement of Undisputed Material Facts, with supporting references, and Memorandum of Law.

## Respectfully submitted,

/s/Daniel A. Horwitz DANIEL A. HORWITZ, BPR #032176 SARAH L. MARTIN, BPR #037707 HORWITZ LAW, PLLC 4016 Westlawn Dr. NASHVILLE, TN 37209 (615) 739-2888 daniel@horwitz.law sarah@horwitz.law

Counsel for Defendants

## **CERTIFICATE OF SERVICE**

I hereby certify that on this the 23rd day of May 2025, a copy of the foregoing was served via the Court's e-filing system upon:

Chanelle Acheson Waddey Acheson LLC 1030 16th Ave. South, Suite 300 Nashville, TN 37212 chanelle@waddeyacheson.com

Counsel for Plaintiff

By: /s/ Daniel A. Horwitz Daniel A. Horwitz, Esq.